

Modern Slavery Statement

For the year ended 31 December 2025

June 2026



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Modern Slavery Statement

For the year ended 31st of December 2025

Introduction

Valtech is committed to conducting business responsibly and ethically while upholding and respecting internationally recognised human rights. This commitment is reinforced by our values of Share, Care, and Dare. Our Modern Slavery Policy is underpinned by our Code of Ethics and reinforced through the implementation and enforcement of robust systems and controls designed to mitigate the risk of modern slavery and child labour occurring throughout our operations and supply chains.

This Modern Slavery Statement (referred to herein as the “Statement”) is made by, and on behalf of, Valtech Limited (hereinafter referred to as “Valtech,” “we,” or “us”), for the financial year ended 31 December 2025 in accordance with section 54(1) of the Modern Slavery Act 2015.

The term “Modern Slavery” encompasses slavery, servitude, forced or compulsory labour and human trafficking. Child labour similarly represents a serious violation of human rights and can have lasting impacts on children's wellbeing, education and development. Valtech maintains a zero-tolerance approach to all forms of Modern Slavery and child labour.

We support the principles contained in the International Bill of Human Rights, the United Nations’ Guiding Principles on Business and Human Rights, and the International Labour Organization (“ILO”) Fundamental Conventions, including the Minimum Age Convention, 1973 (No. 138) and the Worst Forms of Child Labour Convention, 1999 (No. 182). We comply with the laws applicable to the geographic locations in which we operate, including the UK Modern Slavery Act 2015.

We are committed to respecting and protecting human rights in everything we do across our own operations, our supply chains and our business relationships, in alignment with the United Nations’ Guiding Principles on Business and Human Rights, which apply to all companies. Everyone deserves to be treated with dignity and respect, and we are dedicated to supporting decent work, fair treatment, safe working conditions and sustainable economic growth, consistent with the United Nations’ Sustainable Development Goal 8.

01 Our Business and Structure

As an experience innovation company, we empower people and businesses to thrive in a rapidly changing, connected world. We care deeply about the transformative impact technology can have on the world and honour our duty to approach it responsibly.

Our global network comprises more than 5,000 professionals operating across multiple regions and markets. We partner with organisations around the world to deliver digital transformation, customer experience, commerce, data, marketing and technology solutions.

02 Our Supply Chains

Given the nature of our business, our direct supply chains remain relatively straightforward and primarily consist of:

- Providers of Software-as-a-Service (SaaS) solutions;
- Professional services providers (including legal, finance and advisory services);
- IT hardware and telecommunications providers;
- Travel and workplace service providers; and



- Facilities management and office-related suppliers.

While our direct supply chains are generally low risk, some of our suppliers may operate within more complex and layered supply chains, connecting us to numerous businesses around the world.

Valtech is committed to ensuring, as far as reasonably possible, that all our suppliers operating in the sectors listed above uphold our ethical standards and share our commitment to human rights. This includes a firm stance against Modern Slavery and child labour within their enterprises and extended supply chains.

03 Risk Assessment, Risk Management and Due Diligence

During 2025, we continued to assess Modern Slavery risks across our operations and supply chains. Our assessment considered factors including:

- Geographic locations;
- Industry and sector risk;
- Nature of supplied goods and services; and
- Workforce vulnerability.

Based on our assessment, we continue to consider the overall risk of Modern Slavery as low due to the professional and highly skilled nature of our workforce, our operating model, and the sectors in which we primarily conduct business.

In assessing the relevant risks at Valtech, and with reference to the Global Slavery Index, we note that we do not operate in countries or industry sectors generally categorized as “high risk” for slavery, child labour, or human trafficking. While all industries may be susceptible to some degree of Modern Slavery, the majority of known forced labor cases are concentrated in domestic work, construction, and agriculture. Valtech has a limited number of suppliers in these sectors, primarily for office-related services such as cleaning and maintenance, catering, security, office renovations, and courier services.

We maintain systems and procedures to identify, monitor, and mitigate the risk of modern slavery and child labor within our supply chains. These include:

- **Supplier selection and retention processes**, supported by related training and internal briefings, to raise awareness of ethical standards and compliance requirements, and review of supplier compliance and ethical business practices.
- **Local People & Culture functions** across all Valtech regions, overseeing employee matters and administering formal recruitment processes, including pre-employment checks. For our UK-based operations, this includes verification of the right to work in the United Kingdom and adherence to the National Living Wage.

Speak Up and Whistleblowing channels for employees, contractors and third parties to raise concerns confidentially and anonymously.

Valtech will not knowingly engage in business with any organization, including acquisition targets that are involved in Modern Slavery or child labour. We reserve the right to terminate relationships with third parties including clients, suppliers, and other business partners where their conduct is found to be in violation of the Modern Slavery Act 2015 or other applicable Modern Slavery or child labour laws.



We are also committed to protecting whistleblowers who report suspected instances of Modern Slavery or child labour, or who raise concerns about individuals who facilitate or conceal such practices within Valtech, its suppliers or other third-parties.

04 Our Policies

Our approach to preventing Modern Slavery is supported by a framework of policies, guidelines, and training including but not limited to:

- **Code of Ethics:** This Code reaffirms our commitment to preventing modern slavery by adopting a zero-tolerance approach. We are committed to conducting all business with honesty, integrity, and ethical standards, and to implementing and enforcing effective systems and controls to ensure that modern slavery and child labour do not occur within our operations or throughout our supply chains. The Code also makes clear that preventing, identifying, and reporting actual or suspected instances of modern slavery is the responsibility of everyone working for, or on behalf of, Valtech. All employees, officers, directors, contractors, and other business partners are expected to remain vigilant and are encouraged to report any concerns or suspicions relating to Modern Slavery or child labour within our operations or at any level of our supply chains as early as possible.
- **Speak Up and Whistleblower Policy:** this defines the procedures and channels for people to raise any concerns about suspected misconduct confidentially and without fear of retaliation. The global Speak Up and Whistleblowing hotline is an important resource for reporting any Modern Slavery and child labor concerns anonymously.
- **Modern Slavery Policy:** During the reporting period, Valtech created and approved a global Modern Slavery Policy to reinforce our commitment to mitigating the risk of Modern Slavery and child labour within Valtech's supply chains. This Policy applies to all employees and contractors at Valtech and third-party suppliers. It explicitly states Valtech's zero tolerance approach to Modern Slavery and child labour; provides explicit minimum standards for suppliers to follow; highlights how to spot common red flags that may indicate the presence of Modern Slavery and Child Labor; and instructs on how to report any concerns.

05 Progress over time in Addressing Modern Slavery Risks: Goals and KPIs

During 2025, Valtech continued to strengthen its approach to identifying and mitigating Modern Slavery risks and made progress in the following areas:

- **Modern Slavery-related Policies, Onboarding and Reporting Channels**
The risk of individuals being unaware of how to report misconduct relating to human rights violations or indicators of modern slavery and child labour was mitigated through the global rollout of our Whistleblower Policy as part of the onboarding process. All new joiners are required to read the policy in full and formally acknowledge their understanding. During the reporting period, 99.4% of new joiners completed this acknowledgement.
This risk was further reduced through the introduction of our Global Modern Slavery Policy, which reaffirms and strengthens our zero-tolerance approach to all forms of modern slavery and child labour. The policy clearly sets out the mechanisms for reporting actual or suspected concerns, enabling both our workforce and third parties to raise concerns confidentially through our Whistleblowing platform or via a dedicated email channel.
- **Whistleblowing and reported concerns relating to Modern Slavery**
During the reported period:
 - No reports of Modern Slavery or supply chains violations identified within our operations or supply chains.



- No reports indicating the presence of International Labour Organization (“ILO”) labour indicators were received through our reporting channels.

Future focus areas:

- Valtech will continue to reinforce its mandatory Global Modern Slavery Policy by disseminating a policy overview and training to all employees and contractors through its organisation-wide onboarding process and ongoing compliance training programme. The training will be designed to ensure all members of the Valtech Community understand the key requirements of the Global Modern Slavery Policy, including how to identify and report potential instances of Modern Slavery, the organisation's risk management and due diligence systems, and the International Labour Organization (ILO) indicators of forced labor. Training completion will be monitored through centralised learning management systems, with participation and completion metrics tracked and reported. These metrics will be used to establish and measure a Modern Slavery training completion KPI, enabling ongoing oversight, accountability, and continuous improvement of awareness and compliance across Valtech.
- Valtech will continue to reinforce and highlight the importance of preventing Modern Slavery and child labour within our enterprise and supply chains; and to promote the channels for reporting concerns in our communications.
- Valtech will create a Global Supplier Management Policy.
- Valtech plans to include professional services providers within the Supplier Management process and due diligence.

KPIs

- The future focus areas referenced above will allow us to improve our assessment of key performance indicators (KPIs) relating to training.
- These KPIs will help to inform us of the effectiveness of the steps we are taking to ensure that there is no known Modern Slavery in our operations, supply chains or customer and client relationships.

If you have any questions regarding this Statement, please contact us at ethics@valtech.com.

Approval

The Statement has been reviewed and approved by the applicable directors. A copy will be published on our website.

Roy Capon

Valtech Limited Director

June 30, 2026